

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

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2003 OCT 16 P 4: 48

CIVIL ACTION NO. 03-CV-30219-MAD

U.S. DISTRICT COURT  
DISTRICT OF MASS.

\_\_\_\_\_  
SPRINGFIELD LIBRARY AND  
MUSEUM ASSOCIATION, INC.,  
Plaintiff

v.

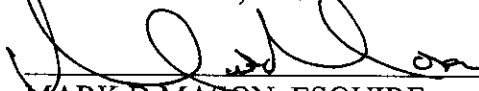
\_\_\_\_\_  
KNOEDLER ARCHIVUM, INC. f/k/a  
M. KNOEDLER & COMPANY, INC.,  
Defendant  
\_\_\_\_\_

**MOTION TO AMEND COMPLAINT**

NOW COMES PLAINTIFF, Springfield Library And Museum Association, Inc. (hereinafter the "Springfield Museums") in the above-referenced matter, and respectfully requests this Court grant leave to file its Second Amended Complaint. A copy of Plaintiff's proposed Second Amended Complaint is filed herewith. In support thereof, the Springfield Museums attaches its Memorandum of Law and states that its proposed Second Amended Complaint sets forth supplemental factual detail in support of the Springfield Museums' claims against Knoedler Archivum, Inc.

WHEREFORE, the Springfield Museums requests this court grant its Motion to Amend Complaint.

SPRINGFIELD LIBRARY AND MUSEUMS  
ASSOCIATION, INC.



MARK D MASON, ESQUIRE

Cooley, Shrair, P.C.

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BBO# 544936

Dated: October 16, 2003

REQUEST FOR ORAL ARGUMENT

The Springfield Library and Museum Association, Inc. requests Oral Argument on its within Motion.

RULE 7.1(A)(2) CERTIFICATION

I, MARK D. MASON, Esquire, do hereby certify that I have conferred with counsel for Knoedler Archivum, Inc., Kenneth W. Salinger, Esq., prior to filing the within Motion in a good faith effort to resolve the within issue.

  
MARK D MASON, ESQUIRE

Certificate of Service

I, Mark D. Mason, Attorney for the Plaintiff, do hereby certify that I have this date served or caused to be served upon Defendant a copy of Plaintiff's Motion to Amend Complaint by mailing the same, postage prepaid first class mail, as follows:

Andrius Kontrimas, Esquire  
Jenkins & Gilchrist  
1100 Louisiana  
Suite 1800  
Houston, TX 77002

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Jenkins & Gilchrist  
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Houston, TX 77002

  
MARK D MASON, ESQUIRE

Dated: October 16, 2003